



The Chrysler Building
405 Lexington Avenue, NY, NY 10174-1299
Tel: 212.554.7800 Fax: 212.554.7700
www.mosessinger.com

Megan H. Daneshrad
Direct Dial: 212.554.7859
Fax: 212.377.6059
E-Mail: mdaneshrad@mosessinger.com

February 2, 2021

VIA ECF

The Honorable John G. Koeltl
United States District Judge
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, New York
10007-1312

Re: **In re Application of ShervinPishevar for an Order to Take Discovery
for Use in Foreign Proceedings Pursuant to 28 U.S.C. §1782, No. 19-
MC-00503 (JGK) (SDA)**

Dear Judge Koeltl:

We are counsel to respondent Marcus Baram ("**Respondent**") in the above-referenced action, and write on consent of counsel for applicant ShervinPishevar ("**Petitioner**") to request an adjournment of the oral argument that is scheduled for February 12, 2021. In connection with this request, Respondent states as follows:

1. Oral argument is currently set for February 12, 2021 at 12:30 PM. The parties are available for argument on February 19, 2021 or as soon thereafter as is practicable for the Court.
2. There have been no previous requests for adjournment.
3. Counsel for Petitioner consents to the Request.

We appreciate the Court's attention to request.

Sincerely,

/s Megan H. Daneshrad

Megan H. Daneshrad

Cc: Lucas Bento, Esq. (Counsel for Petitioner)(via ECF)